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August 10, 2009

*Via Email and ECF*

Hon. Susan R. Nelson  
United States Magistrate Judge  
United States District Court  
District of Minnesota  
United States Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415

Re: ***Dingxi Longhai Dairy, Ltd. v. Becwood Tech. Group LLC***  
Court File No. 08-cv-762 (DSD/SRN)  
Our Ref: 29968-AJP/JMH

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Dear Judge Nelson:

We represent plaintiff Dingxi Longhai Dairy, Ltd. (“Longhai”) in the above-captioned matter and are writing in response to the letter, dated August 4, 2009, submitted by counsel for Becwood Technology Group LLC (“Becwood”).

As indicated by Becwood’s letter, the related New York action has been voluntarily dismissed. We have since attempted to arrive at a stipulation for an amended scheduling order in this case, but have been unsuccessful in doing so.

Longhai respectfully requests the Court to set a discovery deadline of February 1, 2010 since the parties would otherwise be forced to conclude discovery during the December holiday season.

We have already asked Becwood to agree to end discovery by February to avoid such complications. Becwood’s counsel, however, have advised that their client instructed them to reject our proposed dates, without any explanation or further attempt to resolve this minor disagreement without the Court’s involvement.

We are sorry to bother the Court with yet another discovery dispute. While the parties have not agreed on exact dates, we have at least agreed on the parameters, with trial set for March 15, 2010.

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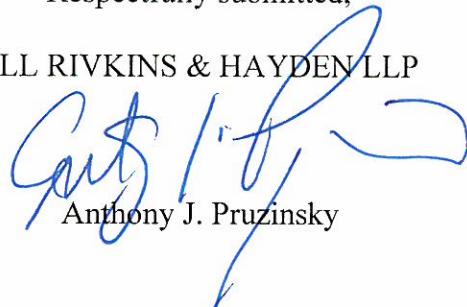
Becwood now claims the Court would only have two weeks to decide dispositive motions under Longhai's proposed schedule. However, Becwood's concern is irrelevant since the Amended Order would presumably state, like the original Order, that the case would be ready for trial either (a) by the stated date or (b) upon resolution of any pending dispositive motions. Nevertheless, Longhai would not object to moving the proposed trial date one month hence to April 15, 2010 to accommodate Becwood's concern.

In light of these matters, as well as Longhai's pending cross-motion for reconsideration before Judge Doty, we believe that a February 1, 2010 discovery deadline is reasonable under the circumstances. We therefore respectfully request the Court to enter an Amended Scheduling Order which reflects the dates proposed by Longhai.

We thank the Court for its consideration of the foregoing and stand by ready to answer any questions the Court may have with respect thereto.

Respectfully submitted,

HILL RIVKINS & HAYDEN LLP

A handwritten signature in blue ink, appearing to read "G. J. Pruzinsky".

Anthony J. Pruzinsky

Cc: Jason A. Lien, Esq. (Jason.lien@maslon.com)

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